

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

August 8 20 19
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

PARK HUNG QUAN,

Defendant.

NO **CR19-148** JCC

INDICTMENT

The Grand Jury charges that:

COUNT 1
(Felon in Possession of Firearm)

On or about July 29, 2019, in King County, within the Western District of
Washington, PARK HUNG QUAN, knowing that he had been convicted of the following
crimes punishable by imprisonment for a term exceeding one year:

- a. *Felon in Possession of Explosives*, Case No. CR83-0039, in the United
States District Court for the Western District of Washington, on or about
November 4, 1983;
- b. *Possession of an Unregistered Firearm*, Case No. M-91-041-01, in the
United States District Court for the Southern District of Texas, on or about
May 23, 1991;

1 did knowingly possess, in and affecting interstate and foreign commerce, the following
2 firearms:

- 3 a. a Sig Sauer, Model P228, 9mm Parabellum caliber semi-automatic pistol,
4 serial number B 304 183,
- 5 b. a Sig Sauer, Model P226, .40S&W caliber semi-automatic pistol, serial
6 number U591698,
- 7 c. a Kel-Tec, Model P F-9, 9mm Luger caliber semi-automatic pistol, serial
8 number S2T97,
- 9 d. a FN, Model FNS-40, .40S&W caliber semi-automatic pistol, serial number
10 GKU0004153,
- 11 e. a GSG, Model 522, .22LR caliber semi-automatic rifle, serial number
12 A438065,
- 13 f. an Anderson, Model AM-15, 5.56 NATO/.223 Remington caliber AR-type
14 semi-automatic rifle, serial number 14090370,
- 15 g. a TGI FPK, 7.62x54Rmm caliber Dragunov-type semi-automatic
16 designated marksman rifle, serial number KR0694,
- 17 h. a GSG, Model GSG-5, .22LR caliber rifle, serial number A331021,
- 18 i. a Century Arms Inc., Model R1A1 Sporter, .308 Winchester caliber rifle,
19 serial number CA33130,
- 20 j. a Steyr-Mannlicher, Model Steyr USR, .223 Remington caliber semi-
21 automatic rifle, serial number 909USR637,
- 22 k. a FN, Model PS90, 5.7x28mm semi-automatic rifle, serial number
23 FN092503, and
- 24 l. a Bushmaster, Model XM15-E2S, 5.56 NATO/.223 Remington caliber AR-
25 type semi-automatic rifle, serial number L435132,

26 that had been shipped and transported in interstate and foreign commerce.

27 All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).
28

ASSET FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

(Count 1)

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), upon conviction of the offense alleged in Count 1 of the Indictment, the defendant, PARK HUNG QUAN, shall forfeit to the United States any firearms and ammunition involved or used in any knowing violation of Title 18, United States Code, Section 922(g), including but not limited to all firearms described in Count 1 above, as well as assorted ammunition seized on or about July 29, 2019, from the defendant's residence located in Seattle, Washington, including:

- a. a Sig Sauer, Model P228, 9mm Parabellum caliber semi-automatic pistol, serial number B 304 183,
- b. a Sig Sauer, Model P226, .40S&W caliber semi-automatic pistol, serial number U591698,
- c. a Kel-Tec, Model P F-9, 9mm Luger caliber semi-automatic pistol, serial number S2T97,
- d. a FN, Model FNS-40, .40S&W caliber semi-automatic pistol, serial number GKU0004153,
- e. a GSG, Model 522, .22LR caliber semi-automatic rifle, serial number A438065,
- f. an Anderson, Model AM-15, 5.56 NATO/.223 Remington caliber AR-type semi-automatic rifle, serial number 14090370,
- g. a TGI FPK, 7.62x54Rmm caliber Dragunov-type semi-automatic designated marksman rifle, serial number KR0694,
- h. a GSG, Model GSG-5, .22LR caliber rifle, serial number A331021,
- i. a Century Arms Inc., Model R1A1 Sporter, .308 Winchester caliber rifle, serial number CA33130,

- j. a Steyr-Mannlicher, Model Steyr USR, .223 Remington caliber semi-automatic rifle, serial number 909USR637,
- k. a FN, Model PS90, 5.7x28mm semi-automatic rifle, serial number FN092503,
- l. a Bushmaster, Model XM15-E2S, 5.56 NATO/.223 Remington caliber AR-type semi-automatic rifle, serial number L435132,
- m. assorted ammunition, two rifle magazines, and a pistol magazine contained within a black Pelican case,
- n. three rifle magazines and .223 ammunition contained within a green ammunition can,
- o. assorted 7.62 ammunition contained within a yellow Pelican case, and
- p. assorted ammunition contained within a black case.

(Substitute Assets)

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant,

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with a third party;
- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or
- 5. has been commingled with other property which cannot be divided without difficulty;

//

//

//

1 it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p) and 28 U.S.C. § 2461(c), to seek the forfeiture of any other property of the
3 Defendant up to the value of the above-described forfeitable property.
4

5 A TRUE BILL:


6 DATED: 8-8-19

7
8 *Signature of foreperson redacted*
9 *pursuant to the policy of the Judicial*
10 *Conference of the United States*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
FOREPERSON

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BRIAN T. MORAN
United States Attorney

16
17
18
19
20
21
22
23
24
25
26
27
28

ANDREW C. FRIEDMAN
Assistant United States Attorney

16
17
18
19
20
21
22
23
24
25
26
27
28

STEVEN T. MASADA
Assistant United States Attorney